

# EXHIBIT 13

**NETWORK DEPOSITION SERVICES**  
**Transcript of Seth Bluestein 30 (b) (6)**

1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3 - - -  
4 DONALD J. TRUMP FOR )  
PRESIDENT, INC., et al., )  
5 )  
Plaintiffs, )  
6 )  
vs. ) No.  
7 ) 2:20-cv-966-RN  
KATHY BOOCKVAR, et al., )  
8 )  
Defendants. )  
9

10 - - -  
11 Videotape Video Conference 30(b)(6) Deposition of  
12 PHILADELPHIA COUNTY BOARD OF ELECTIONS  
13 SETH BLUESTEIN, Designated Deponent

14 Tuesday, September 29, 2020

15 - - -  
16 The videotape video conference deposition of  
17 SETH BLUESTEIN, called as a witness by the plaintiffs,  
18 pursuant to notice and the Federal Rules of Civil  
19 Procedure pertaining to the taking of depositions,  
20 taken before me, the undersigned, Lance E. Hannaford,  
21 Notary Public in and for the Commonwealth of  
22 Pennsylvania, at 2568 Aldon Drive, Sewickley,  
23 Pennsylvania 15143, commencing at 9:04 o'clock a.m.,  
24 the day and date above set forth.  
25

26 - - -  
27 NETWORK DEPOSITION SERVICES  
28 SUITE 1101, GULF TOWER  
29 PITTSBURGH, PENNSYLVANIA  
30 866-565-1929

31 - - -  
32  
33  
34  
35

**NETWORK DEPOSITION SERVICES**  
**Transcript of Seth Bluestein 30 (b) (6)**

30

1 answer.

2 A For in-person mail-in voting there will be  
3 satellite election offices.

4 Q How many of those does Philadelphia County  
5 plan to open?

6 A In addition to the two offices that make up  
7 our headquarters of the county board of elections,  
8 those being city hall and 520 North Columbus  
9 Boulevard, the board of elections has authorized up to  
10 15 additional satellite election offices.

11 Q Do you know how many poll workers  
12 Philadelphia County will require for the general  
13 election?

14 A If per each precinct we average five poll  
15 workers, that would come out to 8,515 poll workers.

16 Q I take it that may change depending on when  
17 you finalize the exact number of polling locations; is  
18 that right?

19 A No.

20 Q So that is a set number of poll workers  
21 that Philadelphia County plans to employ?

22 A That is the number. That is our goal to  
23 employ.

24 Q How many poll workers have signed up so  
25 far?

**NETWORK DEPOSITION SERVICES**  
**Transcript of Seth Bluestein 30 (b) (6)**

37

1 boxes?

2 A We aspire to use drop boxes. But no  
3 decision has been made yet on drop boxes.

4 Q When will the decision of whether or not to  
5 use drop boxes be made?

6 A When a member of the board of elections  
7 makes a motion at a public meeting to use them.

8 Q Has there been a discussion about where  
9 drop boxes would be located in Philadelphia County?

10 MS. HANGLEY: Object to the form.

11 A I would think the deputy commissioners  
12 would utilize a similar data analysis structure to  
13 determine the potential locations where drop boxes  
14 could be put.

15 Q What conversations have taken place  
16 regarding that?

17 MS. HANGLEY: Objection.

18 Q You can answer.

19 MS. HANGLEY: You are referring to  
20 conversations among the deputy commissioners?

21 MR. WINKLOSKY: Any conversations that this  
22 witness has been privy to.

23 MS. HANGLEY: I caution you not to testify  
24 about conversations with counsel, involving  
25 counsel.

**NETWORK DEPOSITION SERVICES**  
**Transcript of Seth Bluestein 30 (b) (6)**

50

1           Q       So is there a way to prevent commingling of  
2     those illegal ballots with actually legally dropped  
3     ballots?

4                   MS. HANGLEY:  Objection.

5           A       No different than illegally cast votes on a  
6     voting machine.  Once the egg is cracked, it can't be  
7     unscrambled.

8           Q       Does your county have a plan right now for  
9     collecting mail-in ballots from those drop boxes?

10          A       We don't have a final plan yet.

11          Q       What is the proposed plan?

12          A       Right now the proposal is to utilize deputy  
13     sheriffs to pick up and deliver the ballots to our  
14     central location.

15          Q       Is there a timeline as to when the deputy  
16     sheriffs would pick up the drop boxes and deliver  
17     them?

18          A       At least daily.

19          Q       Is there a specific time of the day that  
20     the deputy sheriffs would pick up the drop box or  
21     empty the drop boxes?

22          A       Those plans have not been finalized.

23          Q       Is there a proposed plan?

24          A       No.

25          Q       So has there already been discussions with